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Attorneys for Plaintiff
 DAVID ZAITZEFF

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

DAVID ZAITZEFF, et al.,

Plaintiff,

vs.

PEREGRINE FINANCIAL GROUP, INC., et
 al.,

Defendants.

Case No. 2:08-cv-02874-MMM (JWJx)

**EX PARTE APPLICATION TO SEAL
 DOCUMENTS WITH SOCIAL
 SECURITY NUMBERS**

Complaint Filed: May 2, 2008
 Trial Date: None

Plaintiff, David Zaitzeff applies to this Court for *ex parte* relief to seal documents filed by Defendant Peregrine Financial Group, Inc. (“PFG”) which contain the full Social Security Number of Plaintiff David Zaitzeff. Mr. Zaitzeff requests an order that documents #7 and #8 in the docket be sealed and that PFG be ordered to re-file their motion with redacted versions of the putative contract.

MEMORANDUM

Counsel for Plaintiff has met and conferred with Michael Abbott of Jones, Bell, Abbot, Fleming & Fitzgerald, LLP, 601 South Figueroa St 27th FLR, Los Angeles, CA 90017, 213-485-1555. Mr. Abbott indicated that he will not oppose this motion.

On May 21, 2008, PFG filed two identical copies of their Motion to Dismiss. The moving papers as well as all declarations and exhibits were included in a single electronic

1 document. Attached as Exhibit 1 to the declaration of Rebecca Wing contains a reference
2 to the full Social Security number of Mr. Zaitzeff (First paragraph on the page). General
3 Order No. 08-02(IV)(G) requires that private information such as Social Security Numbers
4 be redacted.

5 Mr. Zaitzeff will be irreparably harmed if this motion is not granted because his
6 private information is being disseminated and once downloaded by other third-parties who
7 archive and disseminate this information, it will be impossible to stop further
8 dissemination. Mr. Zaitzeff reserves the right to pursue additional remedies against
9 Defendants and their counsel.

10 It should also be noted that had PFG complied with Local Rule 7-3, this motion
11 would not be necessary as Plaintiff's counsel would have had the required time to inspect
12 the documents and address this issue prior to the documents being filed.

13 Mr. Zaitzeff requests an order that documents #7 and #8 in the docket be sealed and
14 that PFG be ordered to re-file their motion with redacted versions of the putative contract.

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16 DATED: May 28, 2008

LAW OFFICES OF MICHAEL L. TRACY

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18 By: /s/ Michael Tracy
19 MICHAEL TRACY, Attorney for
20 Plaintiff DAVID ZAITZEFF
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**
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11 DAVID ZAITZEFF, et al.,

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13 vs.

14 PEREGRINE FINANCIAL GROUP, INC., et
al.,

15 Defendants.
16

) Case No. 2:08-cv-02874-MMM (JWJx)

) **ORDER GRANTING APPLICATION**
) **TO SEAL DOCUMENTS WITH**
) **SOCIAL SECURITY NUMBERS**

) Complaint Filed: May 2, 2008
) Trial Date: None

17 This matter was brought *ex parte* and no oral argument was requested or granted.
18 The Court has read the papers submitted and concludes that the motion should be
19 GRANTED.
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1 IT IS ORDERED THAT:

- 2 1. The motion of Plaintiff David Zaitzeff is GRANTED.
- 3 2. That Defendant's Motion to Dismiss which was filed in duplicate as documents #7
- 4 and #8 on the docket are to be sealed.
- 5 3. Defendant is to promptly file the Motion to Dismiss with any Social Security
- 6 Numbers redacted and otherwise comply with General Order 08-02.
- 7

8 Dated: _____

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10 UNITED STATES DISTRICT JUDGE

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